

EXHIBIT 10

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)

Plaintiff)

v.)

WORLD AVENUE USA, LLC, et al.)

Defendants)

Case No. PJM 08 cv 0921

**DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S FIRST SET OF
JURISDICTIONAL INTERROGATORY REQUESTS**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and Rule 104 (6) of the Local Rules of the United States District Court for the District of Maryland, Defendant WORLD AVENUE HOLDINGS, LLC ("Holdings") hereby provides its Amended Response to Plaintiff Beyond Systems, Inc.'s ("BSI") Jurisdictional Interrogatory Requests, as follows:

INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who provided information that has been incorporated into your responses to these Interrogatories.

AMENDED RESPONSE TO INTERROGATORY NO. 1:

Pursuant to the Protective Order and Confidentiality Agreement filed with the Court of August 20, 2009, Holdings designates the response to this interrogatory as confidential.

Fidel D. Dhana, employee of Selling Source, LLC.

Jeff Richard, employee of ClickGen, LLC.

Michael Brant, employee of Selling Source, LLC.

INTERROGATORY NO. 8:

IDENTIFY all PERSONS directed, controlled, or employed by YOU who participated or benefited in any fashion from COMMERCIAL E-MAIL sent to a PERSON located in Maryland, residing in Maryland, or with a registered email address in Maryland since January 1, 2004, which shall include the creation, sending, marketing, advertising and customer service of those same e-mails.

AMENDED RESPONSE TO INTERROGATORY NO. 8:

Holdings objects to this Interrogatory on the grounds that the term "YOU" is overly broad, unduly burdensome and oppressive, and beyond the scope of the limited discovery permitted by the Court's order dated July 14, 2009, to support BSI's supplemental opposition to Holdings' motion to dismiss for lack of personal jurisdiction. For purposes of responding to these jurisdictional interrogatory requests, Holdings understands the terms "YOU" to mean Defendant World Avenue Holdings, LLC. Holdings further objects to the extent that the request for "Commercial E-Mail" attempts to circumvent the Court's Orders limiting the scope of discovery.

Subject to and without waiving the foregoing objection, Holdings responds. Holdings did not exist before June 1, 2006 and has no predecessor entity. There are separate entities within the corporate structure in which Holdings serves as a holding company. For example, TheUseful, LLC does engage in the sending and receipt of Commercial E-Mail and internet advertising. Holdings is the parent company to World Avenue USA, LLC and TheUseful, LLC. However, Holdings' business activity is limited to that of a holding company, and, thus, it does

not engage in the sending or receipt of Commercial E-mail as defined herein. Therefore, Holdings has no information responsive to this interrogatory.

INTERROGATORY NO. 12:

IDENTIFY and DESCRIBE YOUR corporate organizational structure, including the location and function of YOUR principal place of business, YOUR place of incorporation, YOUR business status, YOUR membership, YOUR employees, and YOUR location(s).

AMENDED RESPONSE TO INTERROGATORY NO. 12:

Holdings objects to this Interrogatory on the grounds that the term "YOU" and "YOUR" is overly broad, unduly burdensome and oppressive, and beyond the scope of the limited discovery, permitted by the Court's order dated July 14, 2009, to support BSI's supplemental opposition to Holdings' motion to dismiss for lack of personal jurisdiction. For purposes of responding to these jurisdictional interrogatory requests, Holdings understands the terms "YOU" and "YOUR" to mean Defendant World Avenue Holdings, LLC.

Subject to and without waiving the foregoing objection, Holdings responds as follows: Pursuant to the Protective Order and Confidentiality Agreement filed with the Court of August 20, 2009, Holdings designates the response to this interrogatory related to its employees as confidential. Holdings is a company formed under the laws of and registered in the State of Delaware. Holdings' business status is active. Holdings' office is located at 1613 NW 136th Avenue, Suite 100, Sunrise, Florida 33323. World Avenue Management, Inc. f/k/a Niupercent, Inc. and Niuniu Ji hold membership interests in Holdings. From January 1, 2009 to August 31, 2010, Holdings' employees were Robin Hunter, Fidel D. Dhana, Linda Parlon and Anne Antillon (who was hired on July 22, 2009). Mr. Hunter, Mr. Dhana, and Ms. Antillon are

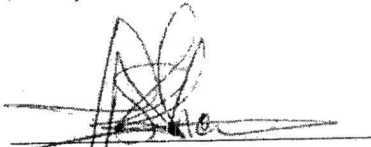
VERIFICATION

I, Fidel D. Dhana, of full age and under penalty of perjury, declare and state as follows:

I am an authorized agent of World Avenue Holdings, LLC, who is authorized to make this Verification. I have read the foregoing DEFENDANT WORLD AVENUE HOLDINGS, LLC'S SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST SET OF JURISDICTIONAL INTERROGATORY REQUESTS and know the content thereof, and, from my own personal knowledge and/or upon information and belief, the same are true.

I verify under penalty of perjury under the laws of the State of Maryland that the foregoing is true and correct.

Executed this 26 day of October at Sunrise, Florida



Fidel D. Dhana